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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 *****
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 OLIVE TOLI,
15 Defendant.

Case No: 2:12-cr-00440-APG-GWF-9
Case No: 2:12-cr-00451-APG-CWH

**STIPULATION TO MODIFY
DEFENDANT OLIVE TOLI'S
CONDITIONS OF RELEASE ON
APPEARANCE BOND
TEMPORARILY TO TRAVEL
OUTSIDE OF CLARK COUNTY,
NEVADA FROM AUGUST 28, 2017-
SEPEMBER 3, 2017**

(Expedited Review Requested)

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20 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden,
21 United States Attorney, and Robert Kneif, Assistant United States Attorneys, counsel for the
22 United States of America, and Melanie A. Hill, counsel for defendant Olive Toli that the travel
23 restriction condition of Olive Toli's release on appearance bond limiting his travel to Clark
24 County [Dkt #69 in 2:12-cr-00440 and Dkt #16 in 2:12-cr-00451] be lifted temporarily to
25 enable him to travel outside of Clark County, Nevada for work from August 28, 2017-
26 September 3, 2017. Mr. Toli's boss needs him to travel from Las Vegas, Nevada to Idaho,
27 Montana, and Wyoming for work purposes, however he needs court permission to travel outside
28 of Clark County, Nevada. The work Mr. Toli did in Cedar City, Utah pursuant to the Court's

1 last order granting the temporary lifting of his travel restriction was completed early, and Mr.
2 Toli has been asked to travel to Idaho, Montana, and Wyoming for completion of additional
3 work.

4 DATED this 25th day of August, 2017.

5	MELANIE HILL Law Office of Melanie Hill 7 By: <u>/s/ Melanie A. Hill</u> 8 MELANIE A. HILL 9 <i>Attorney for Defendant Olive Toli</i>	DANIEL G. BOGDEN United States of America By: <u>/s/ Robert Krief</u> ROBERT KNIEF <i>Attorney for Plaintiff</i>
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11 **ORDER**

12 IT IS HEREBY ORDERED that the travel restriction condition of Olive Toli's release
13 on appearance bond limiting his travel to Clark County [Dkt #69 in 2:12-cr-00440 and Dkt #16
14 in 2:12-cr-00451] be lifted temporarily to enable him to travel from Las Vegas, Nevada to
15 Idaho, Montana, and Wyoming for work purposes from August 28, 2017-September 3, 2017.

16 Dated: August 28, 2017.

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19 ANDREW P. GORDON
20 UNITED STATES DISTRICT JUDGE
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